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7 Attorneys for Defendant
8 PRECISION VALVE & AUTOMATION, INC.

9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 RUBEN JUAREZ an individual and ISELA
13 HERNANDEZ, an individual,

CASE NO. 2:17-cv-003342

14 Plaintiffs,

15 v.
16 PRECISION VALVE & AUTOMATION,
17 INC., a corporation and DOES 1-20,
18 Defendants

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**PRECISION VALVE &
AUTOMATION, INC.'S INITIAL
DISCLOSURES PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 26(A)(1)**

Defendant Precision Valve & Automation, Inc. ("PVA") provides the following Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):

FRCP 26(a)(1)(A)(i) - The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

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1 Pursuant to FRCP 26(a)(1)(A)(i), PVA identifies the following witnesses
 2 who may have information related to PVA's products, plaintiff Ruben Juarez's
 3 claims and/or SpaceX (1) Plaintiffs' witnesses: plaintiff Ruben Juarez, and (2) PVA
 4 witnesses: Frank Hart, Sales Manager; Jeff Van Norden, Engineering Manager; Jon
 5 Connelly, Rework Sales Manager; Alex Duggan, Project Engineer; Mark Kniese,
 6 Controls Engineer; Andrew Haraburda, Customer Service Tech; and Michael
 7 Leonard, Customer Service Tech. PVA has not identified all relevant witnesses
 8 regarding this action including any witnesses plaintiffs may identify in their Rule
 9 26 Disclosures and reserves its right to supplement this disclosure in accordance
 10 with Fed. R. Civ. P. Rule 26(e).

14 **FRCP 26(a)(1)(A)(ii) - A copy – or a description by category and location – of**
 15 **all documents, electronically stored information, and tangible things that the**
 16 **disclosing party has in its possession, custody, or control and may use to**
 17 **support its claims or defenses, unless the use would be solely for impeachment.**

20 Pursuant to FRCP 26(a)(1)(A)(ii), PVA will provide under separate letter to
 21 plaintiffs' attorney electronic versions of non-privileged documents that it may use
 22 to support its claims and/or defenses in this action. These documents consist of
 23 product-related documents, sales-related documents, engineering and design
 24 documents, emails, and other written and electronic communications. PVA also
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1 lists the following documents which have been requested from plaintiffs and third
2 parties but have not yet been received:

- 3 1. Any and all medical, employment and work history records relating to
4 Ruben Juarez;
- 5 2. Any and all records related to the two workers' compensation actions
6 by Ruben Juarez related to his work at SpaceX (including but not
7 limited to any forms, hearings, decisions, pleadings, claims, deposition
8 transcripts, testimony, communications, reports, expert reports and
9 medical records); and
- 10 3. Any relevant business records, communications and/or product records
11 of SpaceX.

12 Discovery regarding these matters is continuing and PVA reserves its right to
13 supplement this disclosure in accordance with Fed. R. Civ. P. Rule 26(e). PVA has
14 not disclosed and will not disclose any information or documents protected by the
15 attorney client privilege or work product rule, and does not believe that any such
16 information or documents may be used to support its claims or defenses in this
17 action.

18 **FRCP 26(a)(1)(A)(iii) - A computation of each category of damages claimed by**
19 **the disclosing party – who must also make available for inspection and copying**
20 **as under Rule 34 the documents or other evidentiary material, unless**

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1 **privileged or protected from disclosure, on which each computation is based,**
2 **including materials bearing on the nature and extent of injuries suffered.**
3

4 PVA is not alleging damages at this time. This response, however, does not
5 waive PVA's right to assert all appropriate litigation costs including attorneys' fees
6 and expert witness costs after the merits of plaintiffs' lawsuit are decided.
7

8 **FRCP 26(a)(1)(A)(iv) - For inspection and copying as under Rule 34, any**
9 **insurance agreement under which an insurance business may be liable to**
10 **satisfy part or all of a possible judgment in the action or to indemnify or**
11 **reimburse for payments made to satisfy the judgment.**
12

13 FRCP 26(a)(1)(A)(iv), PVA will provide under separate letter to plaintiffs'
14 attorney electronic versions of its insurance policies which may provide coverage
15 regarding plaintiffs' action.
16

17 DATED: August 16, 2017

18 BECHERER KANNETT & SCHWEITZER

19 By: 

20 _____
21 Alex P. Catalona,
22 Attorneys for Defendant
23 PRECISION VALVE & AUTOMATION, INC.
24

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Attorneys for Defendant
PRECISION VALVE & AUTOMATION, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RUBEN JUAREZ an individual and ISELA HERNANDEZ, an individual,) CASE NO. 2:17-cv-03342 ODW (GJSx)
)
Plaintiffs,) [Los Angeles County Superior Court
v.) Case No. BC650229]
)
PRECISION VALVE & AUTOMATION,) **CERTIFICATE OF SERVICE**
INC., a corporation and DOES 1-20,)
Defendants.)

I, Jerry M. Dumla, declare that I am employed in the County of Alameda, State of California; I am over the age of eighteen (18) years and not a party to the within entitled action; my business address is 1255 Powell Street, Emeryville, California 94608.

On **August 16, 2017**, I caused to be served the foregoing:

**PRECISION VALVE & AUTOMATION, INC.'S INITIAL DISCLOSURES
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(A)(1)**

In said action by placing a true copy thereof enclosed in a sealed envelope and served in the manner and/or manners described below to each of the parties herein and addressed as follows:

Attorneys for Plaintiff

Teresa Li, Esq.
LAW OFFICES OF TERESA LI, PC
315 Montgomery Street, 9th Floor
San Francisco, California 94104
Telephone: (415) 423-3377
Facsimile: (888) 646-5493
Email: teresa@lawofficesofteresali.com

(By Mail) I deposited such envelope with postage thereon fully prepaid to be placed in the United States Mail at Emeryville, California. I am familiar with the mail collection practices of Becherer Kannett & Schweitzer Attorneys and pursuant to those practices the envelope would be deposited with the United States Postal Service the same day.

(Electronic Filing) I am familiar with the United States District Court, Eastern District of California's practice for collecting and processing electronic filings. Under that practice, documents are electronically filed with the court. The CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document.

Executed on August 16, 2017.

Jerry M. Dumlaq

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